

Exhibit C

Schwartz, Allen

From: Daniel C. Cohn [cohn@cwg11.com]
Sent: Thursday, July 09, 2009 6:27 PM
To: Schiavoni, Tancred
Cc: Schwartz, Allen; Svirsky, Gary; carl.pernicone@wilsonelser.com
Subject: Grace/Motion to Approve Grace-Royal Settlement

Tanc: In due course I will respond to the rest of your email, but there is one aspect I want to address very quickly because it relates to the timing of the depositions you have offered. There is no point in conducting any depositions until the Libby Claimants have received a complete production of documents responsive to our RFP. Arrowood's document production is not complete based on your admitted withholding of draft agreements that are not subject to attorney-client privilege or work-product protection. In order to consider your offer of depositions starting on Monday (which I do very much appreciate), I would need to receive all withheld documents by noon tomorrow. Many thanks. *Dan*

Daniel C. Cohn

COHN WHITESELL & GOLDBERG LLP
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Fax: 617-951-0679

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From: Schiavoni, Tancred [mailto:TSchiavoni@OMM.com]
Sent: Thursday, July 09, 2009 4:57 PM
To: Daniel C. Cohn
Cc: Schwartz, Allen; Svirsky, Gary; Schiavoni, Tancred; carl.pernicone@wilsonelser.com
Subject: Re: Grace

Dan

We sent you a box of documents last night in response to your requests concerning the settlement. Yesterday, I also walked you through a basic set of calculations that indicate how in our view our excess policies were unlikely to be hit.

If you feel that our production is in any way deficient, we wanted to reach out to you and meet and confer on any items you feel are open.

We have conveyed to you our view as to why drafts of the settlement agreements are not relevant and are properly deemed as privileged. Your clients have asserted privilege on identical grounds with regard to outstanding requests against them. Nonetheless, we are prepared to revisit this issue if you tell us it resolves your discovery issues. Frankly, we are concerned that your nothing will satisfy your clients and that they are more interested in creating the appearance of a discovery dispute than anything else.

With regard to depositions, we do not have an outstanding demand. We have answered your questions about the settlement informally and if you have remaining questions we are prepared to address those also. The Plan Proponents have also made themselves available to you in this regard and have offered you a declaration.

7/22/2009

We do not think depositions are necessary or called for under the circumstances. In an effort to resolve this matter, we are willing to offer you my deposition in Charleston, Rhode Island on Monday and a corporate representative in North Carolina next week on the understanding that the schedule remains the same. It is our understanding that you will likewise produce your witnesses and respond to document requests.

The General Stanton Inn in Charleston has a conference room you can use for a deposition.

T.V.S.

From: Daniel C. Cohn <cohn@cwg11.com>
To: Schiavoni, Tancred
Sent: Wed Jul 08 17:40:59 2009
Subject: Grace/Potential Settlement

Tanc: Do you have a complete set of the agreements whereby BNSF permitted Grace to use BNSF facilities on condition that Grace obtain insurance for BNSF? Please send them to me. Since we discussed Libby Claimants assenting to an injunction barring present or future claims based on exposure at such facilities, I want to make sure I have a precise understanding as to what the facilities are. Many thanks. *Dan*

Daniel C. Cohn

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